

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
 v.) CRIMINAL NO. 04-10288-RWZ
)
 JASON MATTHEWS)
)

GOVERNMENT'S MOTION TO EXCLUDE TIME

Now comes the United States, by its attorneys, Michael J. Sullivan, United States Attorney, and David G. Tobin, Assistant U.S. Attorney, and hereby moves to exclude from all Speedy Trial Act calculations the period of time from August 31, 2004 (the date the Court ordered a pre-plea Presentence Report) to and including the date the defendant is sentenced by the Court. The Court has not yet scheduled a date on which to accept the defendant's plea or a date for sentencing. The requested delay is in the interests of justice and outweighs the best interests of the public and the defendant in a speedy trial.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ David G. Tobin
DAVID G. TOBIN
Assistant U.S. Attorney

Dated: September 7, 2005